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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

JON ARNOLD WOODARD,)	
)	CASE NO: A05-0089 CIV (RRB)
Petitioner,)	
)	<u>UNOPPOSED</u>
v.)	<u>MOTION and MEMORANDUM FOR</u>
)	<u>A CONTINUANCE</u>
JOHN CRAIG TURNBULL)	
)	
Respondent.)	
_____)	

Defendant, Jon A. Woodard, through his undersigned counsel, Hugh W. Fleischer, hereby moves for a continuance of the time within which to file an opening brief on the merits from April 11, 2008 to June 11, 2008.

This motion is based on the fact that undersigned counsel must spend an enormous amount of time reviewing the papers filed by the State, which were, as this Court knows, a ninety-nine page brief. In addition, there is more investigation that needs to occur and the undersigned must visit Mr. Woodard at Spring Creek Correctional Facility before finalizing the response. In addition, this office has many other obligations. Therefore, the requested time is necessary

to assure appropriate representation of Mr. Woodard.

The Assistant Attorney General, William H. Hawley, Jr. has authorized the undersigned to advise that the State does not oppose this motion.

Dated this 26th day of March, 2008.

LAW OFFICES OF HUGH W. FLEISCHER

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CERTIFICATE OF SERVICE

I certify that on the 26th day of March, 2008, a true copy of the foregoing was delivered electronically to the following counsel:

W. H. Hawley, Jr.
Office of Special Prosecutions and Appeals
310 K. St., Suite 308
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S/ Hugh W. Fleischer